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as Special Administrator of
the Estate of Anthony L.
Chiaramonti, deceased,
Lewis Chiaramonti, and
Adele Chiaramonti

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

| | | |
|------------------------------|---|--|
| REBECCA CHIARAMONTI, et al., |) | Case No. 2:24-cv-01484-JAD-EJY |
| |) | (Lead Case) |
| Plaintiffs, |) | |
| |) | <i>Consolidated for discovery with related cases</i> |
| v. |) | |
| |) | Case No. 2:24-cv-01490-JAD-EJY (Anderson) |
| UNITED STATES OF AMERICA, |) | Case No. 2:24-cv-01737-JAD-EJY (Tidwell) |
| |) | Case No. 2:24-cv-01896-JAD-EJY (Dale) |
| Defendant. |) | |
| |) | STIPULATED MOTION FOR FIRST |
| AND CONSOLIDATED ACTIONS |) | EXTENSION OF DISCOVERY |
| |) | DEADLINES |

1 Pursuant to Local Rules LR 26-3 and LR IA 6-1 Plaintiffs Rebecca Chiaramonti, Individually
2 and as Special Administrator of the Estate of Anthony L. Chiaramonti, deceased, Lewis Chiaramonti,
3 and Adele Chiaramonti; Plaintiffs Tarra Tidwell as Special Administrator of the Estate of Zachary
4 Rainey, deceased, A.P.R., by and through his mother Tarra Tidwell, and A.B.R., by and through his
5 mother Tarra Tidwell; Plaintiff Cathy Zee Anderson, as personal representative of the Estate of Donald
6 S. Goldberg; Plaintiff, Scott Dale, Individually and as Executor of the Estate of Carol Ann Scanlon,
7 deceased, and Defendant the United States, stipulate and respectfully request the Court enter an Order
8 extending the dates set forth in the stipulated discovery plan in this case filed by the parties and so
9 ordered by the Court November 7, 2024, in *Chiaramonti et al. v. USA*, 2:24-cv-01484-JAD-EJY, and
10 subsequently adopted in the related cases, *Tidwell v. USA*, Case No. 2:24-cv-01737-JAD-EJY, *Anderson*
11 *v. USA*, Case No. 2:24-cv-01490-JAD-EJY, and *Dale v. USA*, Case No. 2:24-cv-01896-JAD-EJY.
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14 In support of these requests, the parties submit:

15 1. This matter involves four separate wrongful death cases arising from the July 17, 2022,
16 midair collision of two aircraft on approach to North Las Vegas Airport. As all four cases make similar
17 allegations of negligence by FAA air traffic controllers, this Court has consolidated the four cases for
18 the purposes of discovery.
19

20 2. Because the four cases were filed separately, the timetable for the United States to
21 respond to the complaint in each case was different. As a result, it was only by January 31, 2025, that
22 the final case, the *Dale* matter, was put on the same discovery plan.

23 3. In light of the consolidated discovery in these cases, the United States has taken the
24 position in these cases that it will only arrange for a single date for an inspection by all plaintiffs'
25 representatives of the air traffic control tower at North Las Vegas Airport, and will only produce one
26 time for deposition by all plaintiffs the air traffic controllers who were on duty in the control tower at
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1 the time of the crash. These events are the key pieces of discovery relating to each Plaintiff's liability
2 case against the government.

3 4. Given the number of parties, each with their own attorneys and experts located all over
4 the country and one of which is the Federal Government, it has been complicated finding dates that will
5 allow the parties to most efficiently conduct the tower inspection and controller depositions. The parties
6 have made their best efforts to find dates to complete these key discovery events and dates were
7 considered that worked within the current scheduling order, but the earliest dates now available for all
8 the parties and their experts are during the week of July 28, 2025.

9
10 5. In the meantime, the Parties have been diligently conducting written discovery, with each
11 Party having served and responded to meaningful discovery, including production of documents, to their
12 adversary(ies).

13
14 6. Unfortunately, the current deadlines for initial expert disclosures is set for June 13, 2025,
15 and, as a result, all parties require extension of the current scheduling deadlines in the consolidated
16 cases.

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18 7. As a result, the parties seek the following extension of approximately 120 days of all
19 deadlines set forth in the stipulated discovery plan and scheduling order so ordered by the Court (ECF
20 No. 17), as follows:

21 **STIPULATED EXTENSION OF SCHEDULING DATES**

22 1. **Discovery cut off:** All discovery must be completed no later than **December 29, 2025**
23 (previously August 29, 2025).

24 2. **Expert Disclosures:** Initial expert disclosures must be made no later than **September**
25 **30, 2025** (previously June 13, 2025). Rebuttal expert disclosures must be made no later than **October**
26 **31, 2025** (previously August 1, 2025).
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3. **Dispositive Motions:** The last day for filing dispositive motions is **January 30, 2026** (previously September 26, 2025).

4. **Joint Pretrial Order:** The proposed joint pretrial order deadline is **February 27, 2026** (previously October 24, 2025). If dispositive motions are pending on **February 27, 2026**, this date is automatically vacated and advanced to 30 days after the Court issues a decision on the pending dispositive motion or motions.

DATED: May 16, 2025

SO STIPULATED:

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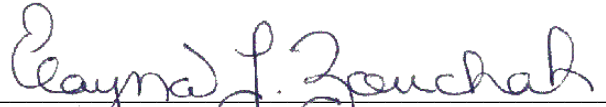
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IT IS SO ORDERED.

A handwritten signature in dark ink, appearing to read 'Elayna J. Youchak', is written over a horizontal line.

ELAYNA J. YOUCHAK

UNITED STATES MAGISTRATE JUDGE

Dated: May 16, 2025